

**DUANE MORRIS LLP**

Wendy M. Simkulak, Esq. (WS-8945)

1540 Broadway, 14th Floor

New York, NY 10036-4086

(212) 692-1000 (Telephone)

(212) 692-1020 (Facsimile)

and

Catherine B. Heitzenrater, Esq. (PA 205597)

30 South 17th Street

Philadelphia, PA 19103-4196

(215) 979-1000 (Telephone)

(215) 979-1020 (Facsimile)

*Counsel for the Chubb Companies*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-23538

(Jointly Administered)

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innoval Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179. The Debtors also include SHC Licensed Business LLC (3718), filed as Case No. 18-23616 and SHC Promotions LLC (9626), filed as Case No. 18-23630 (the "Additional Debtors"). The Additional Debtors each filed a motion in their respective chapter 11 case requesting joint administration with the Debtors for procedural purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

**PLEASE TAKE NOTICE** that **Duane Morris LLP** hereby enters its appearance in the above-referenced Chapter 11 case pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) as attorneys for ACE American Insurance Company, Indemnity Insurance Company of North America, ACE Property and Casualty Insurance Company, Illinois Union Insurance Company, ACE Fire Underwriters Insurance Company, Westchester Surplus Lines Insurance Company, Westchester Fire Insurance Company and Federal Insurance Company (collectively, and together with each of their successors, the “Chubb Companies”) and, pursuant to Bankruptcy Rules 2002, 9007 and 9010(b) and sections 342 and 1109(b) of chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), request that copies of all notices and pleadings given or filed in these cases be given to and served upon the undersigned attorney, at the address set forth below:

Wendy M. Simkulak, Esquire  
Catherine B. Heitzenrater, Esquire  
Duane Morris LLP  
30 South 17th Street  
Philadelphia, PA 19103  
Telephone: 215-979-1000  
Fax: 215-979-1020  
Email: [WMSimkulak@duanemorris.com](mailto:WMSimkulak@duanemorris.com)  
[CHeitzenrater@duanemorris.com](mailto:CHeitzenrater@duanemorris.com)

**PLEASE TAKE FURTHER NOTICE** that the foregoing request specifically includes a requests for service of all notices and pleadings given or filed in these cases issued pursuant to the relief requested in the *Motion Of Debtors For Entry Of An Order Authorizing And Establishing Procedures For De Minimis Assets Sales And De Minimis Asset Abandonments* [Docket No. 427] and/or the *Debtors' Motion For Approval Of Global Bidding Procedures* [Docket No. 429].

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned case and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request for Service of Notices and Papers is neither intended as nor is it a consent of the Chubb Companies to the jurisdiction of the Bankruptcy Court, and this Notice of Appearance and Request for Service of Notices and Papers shall not be deemed to be a waiver of the right of the Chubb Companies (1) to have final orders in non-core matters entered only after *de novo* review by a higher court; (2) to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related to this case; (3) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (4) to any rights, actions, or defenses relating to the scope of the Bankruptcy Court's jurisdiction pursuant to the United States Supreme Court's decision in *Stern v. Marshall*, 131 S. Ct. 2594 (2011); or (5) to any other rights, claims, actions, setoffs, or recoupments to which the Chubb Companies are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Chubb Companies expressly reserve. Nor shall this Notice of Appearance and Request for Service of Notices and Papers be deemed to constitute consent to

electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: November 8, 2018

Respectfully submitted,

DUANE MORRIS LLP

/s/ Wendy M. Simkulak

Wendy M. Simkulak, Esq. (WS-8945)  
1540 Broadway, 14th Floor  
New York, NY 10036-4086  
(212) 692-1000 (Telephone)  
(212) 692-1020 (Facsimile)

*Counsel for the Chubb Companies*